THE HONORABLE BRIAN D. LYNCH 1 **CHAPTER 13 HEARING DATE: July 17, 2019** 2 **HEARING TIME: 1:30 P.M.** LOCATION: Tacoma, Washington 3 **RESPONSE DATE: July 10, 2019** 4 5 6 7 8 9 IN THE UNITED STATES BANKRUPTCY COURT FOR THE 10 WESTERN DISTRICT OF WASHINGTON AT TACOMA 11 12 In re: Case No.: 14-45915-BDL 13 TODD LINCOLN SHILLAM, TRUSTEE'S RESPONSE TO DEBTOR'S MOTION TO APPROVE SETTLEMENT AND 14 **DEBTOR'S EXEMPTIONS** Debtor. 15 16 **COMES NOW**, Michael G. Malaier, Chapter 13 Standing Trustee, and responds to 17 Debtor's Motion to Approve Settlement and Debtor's Exemptions ("Motion")(ECF No. 24), as 18 follows: 19 **BACKGROUND** 20 Debtor filed this Chapter 13 case on November 3, 2014. The applicable commitment 21 period is sixty months. The case is currently in the fifty sixth month. The bar date for filing 22 non-governmental claims was March 4, 2015. Filed unsecured claims total \$46,693.83. The 23 Trustee estimates that under the proposed plan general unsecured creditors will receive 24

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approximately \$0.00.

Trustee does not generally oppose Debtor's Motion; however, Trustee requests that language be added to the proposed order specifically authorizing him to disburse the non-exempt liquidation value of \$28,097.91 to unsecured creditors upon receipt of the same.

WHEREFORE, subject to the condition above, Trustee requests that the Motion be granted.

DATED this 10th day of July, 2019.

/s/ Mathew S. LaCroix

Mathew S. LaCroix, WSBA# 41847 for Michael G. Malaier, Chapter 13 Trustee